

**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

WILLIAM D. HERRIN,

Plaintiff,

VS.

ALLIED SERVICING CORPORATION.

Defendant.

Case No. 1:20-cv-01439

DECLARATION IN SUPPORT OF MOTION FOR ENTRY OF DEFAULT

Rusty A. Payton declares under penalty of perjury, as provided for by the laws of the United States 28 U.S.C. § 1746, that the following statements are true:

1. I am the attorney for the Plaintiff in this action and I am familiar with the file, records and pleadings in this matter.
2. The complaint was filed on February 27, 2020 ([Dkt. 1](#)).
3. Defendant is not an infant, in the military, or an incompetent person.
4. Defendant was properly served with a copy of the summons and complaint on January 9, 2020 ([Dkt. 4](#)).
5. An answer to the complaint was due on February 28, 2020.
6. Defendant has failed to appear, plead or otherwise defend this action within the time allowed and, therefore, is now in default.
7. Plaintiff requests that the Clerk of Court enter default against the Defendant.

Executed this 23rd day of March, 2020.

/s/ Rusty A. Payton
Rusty A. Payton
Counsel for Plaintiff